

EXHIBIT B

FILED

SUPERIOR COURT OF THE STATE OF OHIO

2024 AUG 27 P 1:52

COUNTY OF CUYAHOGA

CLERK OF COURTS  
CUYAHOGA COUNTY

Jerome D Deal  
1300 Crestline Ave. Apt 411  
Cleveland, Ohio 44109  
Plaintiff

Judge: SHANNON M GALLAGHER

CV 24 102854

v.

COMPLAINT

Craig Kallman  
Atlantic Records  
1633 Broadway  
New York, New York 10019  
Defendant

Tommy Jones  
Dead Game Records  
3950 Government St  
Baton Rouge, LA 70806  
Defendant

Travis Johnson  
Dead Game Records  
3950 Government St  
Baton Rouge, LA 70806  
Defendant

-----  
Plaintiff complains and for causes of action alleges as follows:

1. Plaintiff is an individual and is now, and at all times mentioned in this complaint was, a resident of Cuyahoga County, Cleveland Ohio.
2. Plaintiff has attended College as an undergraduate to later earn a master's degree and returning for a doctoral degree and is currently a Furnace operator for Twenty Months and has resided in Cleveland, Ohio for Forty-Three years. Plaintiff has since 2000 enjoyed a good reputation, both generally and his Online Footprint as an Ohio Employee.
3. Defendant Craig Kallman is an individual and is now, and at all times mentioned in this

complaint a CEO of Atlantic Records in the New York County. Tommy Jones and Travis Johnson Dead Game Records mentioned in this complaint as the Owners of Dead Game Records.

4. Defendant Craig Kallman CEO of Atlantic Records, is now, and at all times mentioned in this complaint was, a corporation organized and existing under the laws of the State of California, with its principal place of business in California in Sacramento County, California. Tommy Jones and Travis Johnson place of business is in Baton Rouge County, Louisiana and existing under the laws of the State of Louisiana.

5. The true names of defendants DOES 1 through 50, inclusive, are unknown to plaintiff at this time. Plaintiff sues those defendants by such fictitious names pursuant to section 474 of the Code of Civil Procedure. Plaintiff is informed and believes, and based on that information and belief alleges, that each of the defendants designated as a DOE is legally responsible for the events and happenings referred to in this complaint, and unlawfully caused the injuries and damages to plaintiff alleged in this complaint.

6. Plaintiff is informed and believes, and based on that information and belief alleges, that at all times mentioned in this complaint, defendants were the agents and employees of their codefendants and in doing the things alleged in this complaint were acting within the course and scope of such agency and employment.

7. On or about 2014, defendants published Kevin Gates, Out the Mud [description of defamatory matter, for example: a song telling my first name and last name initial on songs written on the screen. The lyrics which recorded in my private home as noticed as embezzlement].

8. The 2019 Kevin Gates, song Fatal Attraction [description of publication, for example: lyrics in the song refer to nicknames or middle name even my fathers last name Vale is that name everyone knows me by] referred to plaintiff by name Jerome throughout every recording, was made of and concerning plaintiff, and was so understood by those who listen the greatest hits [description of publication, for example: lyrics performed in the privacy of my home, car, and neighbors home].

9. The entire statement are personal preference drafted for later edits. Kevin Gates song Discussion "I ain't think with them crackers" is false as it pertains to plaintiff as a racist [only parts of the publication are defamatory, specifically set forth the false portions.]

10. The song Kevin Gates, Tomorrow [description of publication, for example: lyrics refer to momma never told me to hit a woman, but I bat hoes in the mouth] which was intended to be I steal bat holes in the mouth naming several other animals in my home is libelous on its face. It clearly exposes plaintiff to hatred, contempt, ridicule, and obloquy because the awareness of music with no contract or recording was nevertheless a fact, I never was going to release these songs even further have the knowledge of how they obtained them, I have songs recorded in remote areas where no device can access the sound and I still find it online with me announcing a street name, or my name.

11. The songs Out the Mud, Fatal Attraction, Discussions, and Tomorrow [description of publication, for example: other songs made remarks about the police. On or about 2014 to today by the other entertainers and fans heard more remarks made about JayZ, And Beyoncé in Kevin Gates, song Super General.

12. As a proximate result of the above-described publication, plaintiff has suffered loss of a doctoral degree his reputation, shame, mortification, and injury to my right arm, and lung because the recording dates back further than acknowledged to the actual year of 2000. As a Victim of Crime and a victim of police brutality [the total amount of \$240,000 or, if the action is brought in superior court, a total amount to be established by proof at trial].

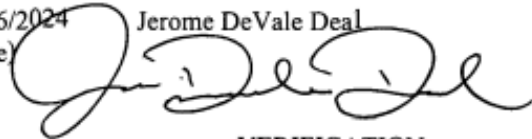
13. The above-described publication was not privileged because it was published by defendants with Kevin Gates music only [specify state of mind and facts supporting the allegation, for example: malice, hatred and ill will toward plaintiff and the desire to injure Jerome (him or her), in that defendants had expressed a desire to "get" plaintiff]. Because of defendants' malice in publishing, plaintiff seeks punitive damages in \$500,000 [the total amount of \$740,000 or, if the action is brought in superior court, a total amount to be established by proof at trial].

WHEREFORE, plaintiff demands judgment against defendants, and each of them, for:

1. Compensatory damages according to proof;
2. Punitive damages;
3. Interest as allowed by law;
4. Costs of suit; and
5. Such other and further relief as this court may deem just and proper.

DATED: 08/26/2024  
(Signature)

Jerome DeVale Deal



VERIFICATION

I, Jerome Deal am a Plaintiff in the above-entitled action. I have read the foregoing statement and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed at Cleveland, Ohio.

DATED: 8/27/24

Sworn to me this 27<sup>th</sup> day of August, 2024.

  
Notary public



MIRIAM MIRANDA  
Notary Public, State of Ohio  
My Commission Expires  
August 02, 2028



Common Pleas Court of Cuyahoga County, Ohio

**FILED**

DESIGNATION FORM TO BE USED TO INDICATE THE CLASSIFICATION OF THE CAUSE

Jerome Deal  
Plaintiff  
Vs  
Craig Kallman  
Defendant

2024 AUG 27 P 1:51

Judge: SHANNON M GALLAGHER

CV 24 102854

CLERK OF COURTS  
CUYAHOGA COUNTY

Has this case been previously filed and dismissed? Yes ☐ No ☒

Case #: \_\_\_\_\_ Judge: \_\_\_\_\_

Is this case related to any new cases now pending or previously filed? Yes ☐ No ☒

Case #: \_\_\_\_\_ Judge: \_\_\_\_\_

**CIVIL CLASSIFICATIONS: Place an (X) in ONE Classification Only.**

**Professional Torts:**

- ☐ 1311 Medical Malpractice
- ☐ 1315 Dental Malpractice
- ☐ 1316 Optometric Malpractice
- ☐ 1317 Chiropractic Malpractice
- ☐ 1312 Legal Malpractice
- ☐ 1313 Other Malpractice

**Product Liability:**

- ☐ 1330 Product Liability

**Other Torts:**

- ☐ 1310 Motor Vehicle Accident
- ☐ 1314 Consumer Action
- ☒ 1350 Misc. Tort

**Workers Compensation:**

- ☐ 1550 Workers Compensation
- ☐ 1531 Workers Comp. Asbestos

**Foreclosures:**

- ☐ Utilize Separate Foreclosure Designation Form

**Commercial Docket:**

- ☐ 1386 Commercial Docket
- ☐ 1387 Commercial Docket with Foreclosure

**Administrative Appeals:**

- ☐ 1540 Employment Services
- ☐ 1551 Other

**Other Civil:**

- ☐ 1500 Replevin/Attachment
- ☐ 1382 Business Contract
- ☐ 1384 Real Estate Contract
- ☐ 1388 Consumer Debt
- ☐ 1390 Cognovit
- ☐ 1391 Other Contracts
- ☐ 1490 Foreign Judgment
- ☐ 1491 Stalking Civil Protection Order
- ☐ 1501 Misc. Other
- ☐ 1502 Petition to Contest Adam Walsh Act
- ☐ 1503 Certificate of Qualification for Employment

**Amount of Controversy:**

- ☐ None Stated
- ☐ Less than \$25,000
- ☒ Prayer Amount 740,000

**Parties have previously attempted one of the following prior to filing:**

- ☐ Arbitration
- ☐ Early Neutral Evaluation
- ☐ Mediation
- ☐ None

I certify that to the best of my knowledge the within case is not related to any now pending or previously filed, except as noted above.

Jerome Deal

Firm Name (Print or type)

1300 Crestline AVE.

Address

APT 411 Cleveland

Address

(216) 650-7683

Phone

Attorney of Record (Print or Type)

Supreme Court #

Jerome.deal@yahoo.com

Email Address

Jerome Deal

Signature

THE COURT OF COMMON PLEAS, CIVIL DIVISION  
CUYAHOGA COUNTY, OHIO

Clerk of Courts | The Justice Center | 1200 Ontario Street 1st Floor, Cleveland, Ohio 44113

JEROME D. DEAL  
Plaintiff

CASE NO. CV24102854

JUDGE SHANNON M GALLAGHER

v.

CRAIG KALLMAN ET AL  
Defendant

**SUMMONS** SUMC CM

Notice ID: 54668274



From: JEROME DEAL P1  
1300 CRESTLINE AVE. APT. #411  
CLEVELAND OH 44109-0000

Atty.: JEROME DEAL  
1300 CRESTLINE AVE. APT. #411  
CLEVELAND, OH 44109-0000

To: CRAIG KALLMAN D1  
ATLANTIC RECORDS  
1633 BROADWAY  
NEW YORK NY 10019-0000

**NOTICE TO THE DEFENDANT:**

The Plaintiff has filed a lawsuit against you in this Court. You are named as a defendant. A copy of the **Complaint** is attached.

If you wish to respond to the Complaint, you must deliver a written **Answer** to the Plaintiff's attorney (or the Plaintiff if not represented by an attorney) at the above address *within 28 days* after receiving this Summons (not counting the day you received it). A letter or a phone call will not protect you. Civil Rule 5 explains the ways that you may deliver the **Answer** (<http://www.supremecourt.ohio.gov/LegalResources/Rules/civil/CivilProcedure.pdf>)

You must also file a copy of your **Answer** with this Court within 3 days *after* you serve it on the Plaintiff. You can file your **Answer** with the Clerk of Courts by one of the following methods: 1) In-person or by mail at the above address or 2) electronically through the online e-Filing system. For more information on using the e-Filing system, visit <http://coc.cuyahogacounty.us/en-US/efiling.aspx>.

If you fail to serve *and* file your **Answer**, you will lose valuable rights. The Court will decide the case in favor of the Plaintiff and grant the relief requested in the **Complaint** by entering a default judgment against you.

You may wish to hire an attorney to represent you. Because this is a civil lawsuit, the Court cannot appoint an attorney for you. If you need help finding a lawyer, contact a local bar association and request assistance.



Nailah K. Byrd  
Clerk of Court of Common Pleas  
216-443-7950

Date Sent: 08/28/2024

By \_\_\_\_\_

Deputy